

1 Deverie J. Christensen
Nevada State Bar No. 6596
2 Daniel Aquino
Nevada State Bar No. 12682
3 **JACKSON LEWIS P.C.**
300 S. Fourth Street, Suite 900
4 Las Vegas, Nevada 89101
Tel: (702) 921-2460
5 Email: deverie.christensen@jacksonlewis.com
daniel.aquino@jacksonlewis.com

6 *Attorneys for Defendants*
7 *Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
12 situated,

13 Plaintiff,

14 vs.

15 STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
16 a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
17 Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

18 Defendants.
19
20
21

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND
DEADLINE FOR ALL DEFENDANTS
TO RESPOND TO PLAINTIFFS'
COMPLAINT AND SUBMIT
PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER**

**(SECOND REQUEST – Response to
Complaint)**

**(FIRST REQUEST – Submission of
Proposed Discovery Plan and Scheduling
Order)**

22 IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader (“Plaintiff”),
23 through her counsel Richard Harris Law Firm, and Defendants Wynn Las Vegas, LLC and
24 Wynn Resorts, Ltd. (“Defendants”), through their counsel Jackson Lewis P.C., Defendant
25 Stephen Alan Wynn, through his counsel Peterson Baker, PLLC, and Defendant Maurice
26 Wooden, by and through his counsel Kennedy & Couvillier, that all Defendants shall have a 30-
27 day extension up to and including February 26, 2020, in which to file responses to Plaintiffs’
28

1 Complaint; and, that the Parties will have an extension to submit a proposed discovery plan and
2 scheduling order to the Court, one week later, on March 4, 2020.

3 This Stipulation is submitted and based upon the following:

4 1. Defendants Wynn Las Vegas, LLC's and Wynn Resorts, Ltd.'s responses to the
5 Complaint currently are due on January 27, 2020. *See Order* [ECF No. 7].

6 2. Defendant Stephen Alan Wynn's response to the Complaint is currently due on
7 February 3, 2020. *See Order* [ECF No. 12].

8 3. Defendant Maurice Wooden's response to the Complaint is currently due on
9 February 3, 2020. *See Order* [ECF No. 17].

10 4. Due to the class and collective claims alleged in the Complaint and pending
11 discussions between Plaintiffs' and Defendants' counsels in this case regarding the allegations,
12 multiple subclasses, and necessary investigation of the class and collective claims, additional time
13 is needed by all Defendants in order to respond to the Complaint.

14 5. In addition, pursuant to LR 26-1, the proposed discovery plan and scheduling order
15 is currently due no later than January 29, 2020.

16 6. However, the Parties presently are discussing the class claims in this case and
17 exploring whether some of the issues and claims may be narrowed or resolved early without the
18 need for motion practice prior to commencing discovery, which may further narrow the scope of
19 discovery in this class action case with multiple subclasses. Thus, the Parties request the Court
20 grant an extension on the deadline to submit the proposed discovery plan and scheduling order so
21 the Parties can conclude their discussions and submit their responses to the Complaint prior to
22 submitting a proposed discovery plan and scheduling order.

23 7. The parties request the Court grant an extension of the deadline to file a response
24 to the Complaint to February 26, 2020, and grant an extension of the deadline to file a proposed
25 discovery plan and scheduling order pursuant to LR 26-1 to March 4, 2020.

26 8. This is the first request for an extension of time for the Parties to file a proposed
27 discovery plan and scheduling order pursuant to LR 26-1.

1 9. This is the second request for an extension of time for Defendants to file a
2 response to Plaintiff's Complaint.

3 10. This request is made in good faith and not for the purpose of delay.

4 11. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
5 as waiving any claim and/or defense held by any party.

6 Dated this 24th day of January, 2020.

7 RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

8 /s/ Burke Huber

/s/ Deverie J. Christensen

9 Richard Harris, Bar No. 505
10 Benjamin Cloward, Bar No. 11087
11 Burke Huber, Bar No. 10902
12 801 S. Fourth Street
13 Henderson, Nevada 89101

Deverie J. Christensen, Bar No. 6596
Daniel Aquino, Bar No. 12682
300 S. Fourth Street, Ste. 900
Las Vegas, Nevada 89101

12 Attorney for Plaintiff
13 Brenna Schrader

Attorneys for Defendants
Wynn Las Vegas, LLC and Wynn Resorts,
Ltd.

14 KENNEDY & COUVILLIER

PETERSON BAKER, PLLC

15 /s/ Maximiliano Couvillier

/s/ Tamara Beatty Peterson

16 Maximiliano D. Couvillier, Bar No. 7661
17 3271 E. Warm Springs Road
18 Las Vegas, Nevada 89120

Tamara Beatty Peterson, Bar No. 5218
10001 Park Run Drive
Las Vegas, Nevada 89145

18 Attorney for Defendant
19 Maurice Wooden

Attorney for Defendant
Stephen Alan Wynn

20 **ORDER**

21 IT IS SO ORDERED:

22 

23 United States District Court/Magistrate Judge

24 1/30/2020

25 Dated: _____